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## EXHIBIT 5

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**INTERROGATORY NO. 2:**

Please define the term "retail enterprise facility" as you intended it in your communications with NCC.

**ORIGINAL RESPONSE:**

The term retail/enterprise facility was used to describe a preexisting enterprise services multiplexer at a given location, which was installed to provide the average amount of telecommunications services to end-user subscribers within a building.

**AMENDED RESPONSE:**

The term "retail/enterprise facility" is not a common or standard term used in Verizon. Upon further investigation, Verizon has discovered that the Verizon response in the 12/13/2002 e-mail communication that NCC has referenced throughout this litigation was based on the following interpretation of the referenced terminology:

A retail service, such as a DS1 Primary Rate Interface (PRI), or a business dial-tone line.

**STATE OF ILLINOIS**

**ILLINOIS COMMERCE COMMISSION**

**DATA REQUEST NUMBERS 1 – 30**

Requested of Company Representative: James R. Hargrave

Company: Verizon North Inc. and Verizon South Inc. ("Verizon")

Docket No.: 02-0147

Date Submitted: 03/08/02

Date Response: 03/22/02

**INTERROGATORY NO. 10:**

Is it your policy to refuse to interconnect with certificated competitive local exchange carriers at retail enterprise facilities?

**RESPONSE:**

No. Verizon interconnects with CLECs in accordance with the terms and conditions of the Interconnection Agreement between Verizon and each individual CLEC. The Verizon North Inc./ North County Communications Corporation Interconnection agreement for Illinois was filed with the Illinois Commerce Commission on March 1, 2002.

Provided by: James R. Hargrave

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STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

DATA REQUEST RESPONSES RESULTING  
FROM THE MOTION TO COMPEL

Requested of Company Representative: James R. Hargrave

Company: Verizon North Inc. and Verizon South Inc. ("Verizon")

Docket No.: 02-0147

Date Submitted: 04/20/02

Date Response: 05/20/02

**INTERROGATORY NO. 28:**

Has Verizon interconnected with a CLEC at a retail facility in the past six months?

**RESPONSE:**

Objection. The term "retail facility" is vague and its meaning undefined. Without waiving this objection, Verizon responds as follows:

The term "retail facility" is not a common or standard term used in Verizon when describing interconnection with carriers. If the term retail facility means a building where only business and/or residence customers are located, interconnection with a CLEC for unbundled loops occurs at retail facilities.

If the term "retail facility" means a building housing both business customers (non-carriers) and telecommunications carriers, then the majority of telecommunications carriers that Verizon interconnects with for local trunks, and IXC trunks, locate their equipment (POPs) at retail facilities.

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DATA REQUEST RESPONSES RESULTING  
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Date Submitted: 04/20/02

Date Response: 05/20/02

**INTERROGATORY NO. 29:**

Conduct a limited review of situations where CLECs ordered three or fewer T-1s in the past 12 months (between 5 and 10 situations) and state if any of the identified CLECs were required to wait for a fiber build-out.

**RESPONSE:**

Objection. The term "fiber build-out" is vague and its meaning undefined. Without waiving this objection, Verizon responds as follows:

Verizon engineers make site specific equipment/technology deployment decisions on a case-by-case basis, considering the type(s) of services to be provided, overall economic efficiency, and current and future demand. Verizon Illinois' engineers could not identify any locations, in the past 12 months, with three or fewer DS1s(T-1's) where new fiber optic facilities were constructed.

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STATE OF ILLINOIS

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PRODUCTION OF DOCUMENT REQUEST RESULTING  
FROM THE MOTION TO COMPEL

Requested of Company Representative: James R. Hargrave

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Date Submitted: 04/20/02

Date Response: 05/20/02

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 3:

On November 1, 2001, did any Verizon facilities in DeKalb, Illinois exist where Verizon had sufficient capacity to install three or more T-1s? A detailed list of each facility with capacity is not required.

**RESPONSE:**

No records are available as to the availability of facilities with sufficient capacity as of November 1, 2001.

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Docket No.: 02-0147

Date Submitted: 04/20/02

Date Response: 05/20/02

**REQUEST FOR PRODUCTION NO. 4:**

If Verizon makes a distinction between "retail enterprise" and "wholesale" facilities, please provide all documents which refer, relate to or otherwise evidence the distinction.

**RESPONSE:**

No documents exist. The terms "retail enterprise facility" and "wholesale facility" are not common or standard terms used in Verizon.

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Docket No.: 02-0147

Date Submitted: 04/20/02

Date Response: 05/20/02

**REQUEST FOR PRODUCTION NO. 5:**

All documents which refer, relate to or otherwise evidence Verizon's fiber build-outs for CLEC interconnection at locations that had, at the time of the request for interconnection by the CLEC, "retail enterprise" capacity as that term is used by VERIZON in its correspondence with NCC, in any of the territories you service or have served in the past 12 months.

**RESPONSE:**

Objection. The terms "retail enterprise" and "fiber build-outs" are vague and undefined. Without waiving this objection, Verizon responds as follows:

Verizon has no documents that refer, relate to or otherwise evidence a fiber build-out for a CLEC interconnection when, at the time of the CLEC request for interconnection, sufficient capacity for interconnection existed at a "retail enterprise" facility.

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Date Submitted: 04/20/02

Date Response: 05/20/02

**INTERROGATORY NO. 13:**

In a general sense, are there any technical infeasibilities that could prevent you from interconnecting with certificated competitive local exchange carriers at retail enterprise facilities?

**RESPONSE:**

Objection. The use of the term "retail enterprise facility" is vague and its meaning undefined. Without waiving this objection, Verizon responds as follows:

Yes. The term "retail enterprise facility" is not a common or standard term used in Verizon. The technical feasibility of interconnection at a specific location depends on a number of factors including, but not limited to, the following: 1) the specific interconnection service(s) being requested, 2) the physical and technical characteristics of connection between the two carriers (e.g. the interconnection interface), 3) the network equipment components that are owned and operated by each carrier, 4) the operational responsibilities of the two carriers relative to the service provided and the equipment used, 5) network reliability, and 6) network security.

Given the large number of these situation specific variables, there are some interconnection arrangements that are not technically feasible. See response to Interrogatory No. 14.

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